
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

**MOTION TO MODIFY CONDITIONS
OF RELEASE**

Case No. 22-mj-00783-DTS-1

v.

MEKFIRA HUSSEIN,

Defendant.

Defendant Mekfira Hussein, by and through counsel, Jason Steck, and, pursuant to 18 U.S.C. § 3145(a)(2), moves the Court to modify conditions of release such as to allow return of Defendant's passport and allow travel to Goba, Ethiopia, to attend to her gravely ill father-in-law, from October 10, 2022 to November 1, 2022.

The undersigned attempted to contact Ms. Hussein's pretrial supervision agent, Ameer Fisher, but did not receive a response to voicemail. It is noteworthy, however, that Pretrial Services recommended release at the detention hearing. Pretrial Services is also known to be in possession of Ms. Hussein's passport, as the undersigned delivered it personally to Pretrial Services at the detention hearing..

The undersigned has contacted counsel for the Government, Matthew Evert, who stated that the Government opposes this request.

In support of this motion, Defendant notes that she voluntarily surrendered herself immediately upon learning of the filing of the Complaint and voluntarily surrendered her passport at her detention hearing. Defendant would reside at her mother's residence in Goba during her stay and would provide complete contact information to her pretrial

services prior to departure. Other factors ensuring Ms. Hussein's return, including family, assets, and employment in the United States, are as set forth in the Pretrial Services Report.

Date: September 28, 2022

/s/ Jason Steck
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